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Attorneys for OneBeacon Insurance
13 Company as successor in interest to
American Employers' Insurance Company
14 with respect to certain contracts of insurance

15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 In re:
19 PLANT INSULATION COMPANY,
20 Debtor.

CASE NO. 09-31347-TC

CHAPTER 11

**CERTAIN INSURERS' RESPONSE TO
DEBTOR'S THIRD MOTION FOR ORDER
EXTENDING THE EXCLUSIVE PERIOD
FOR DEBTOR TO SOLICIT
ACCEPTANCES ON ITS PLAN**

Hearing

Date: September 13, 2010

Time: 9:30 a.m.

Place: 235 Pine St., 23rd Floor
San Francisco, CA

Judge: Hon. Thomas E. Carlson

1 **Additional Counsel:**

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1 The insurers identified below (collectively, the “Insurers”)¹ submit the following Response
2 (“Response”) to Plant’s Third Motion for Order Extending The Exclusive Period for Debtor to Solicit
3 Acceptances on Its Plan (the “Motion”).

4 The Insurers do not oppose granting the specific relief requested by Plant, to wit: extending
5 its exclusive period to obtain acceptance of its plan of reorganization through January 20, 2011. The
6 Insurers file this paper to ensure that the Insurers’ lack of opposition to the Motion is not understood
7 or interpreted to indicate agreement with any of the factual recitations or legal conclusions contained
8 in the Motion. For example, the Insurers do not agree with certain statements contained in the
9 Motion, including, but not limited to, Plant’s characterization of its insurance coverage and the
10 related declaratory relief action. The Insurers also reserve all rights to oppose any additional relief
11 sought by Plant that is not specifically identified in its Motion and to object to any requests for
12 further extension of the exclusive periods.

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14 Dated: September 7, 2010

SONNENSCHN NATH & ROSENTHAL LLP

15 By /s/ Robert B. Millner
16 ROBERT B. MILLNER

17 Attorneys for OneBeacon Insurance Company as
18 successor in interest to American Employers’
Insurance Company with respect to certain contracts
19 of insurance

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26 ¹ The “Insurers” are: OneBeacon Insurance Company, Fireman’s Fund Insurance Company; American Automobile
27 Insurance Company, Mt. McKinley Insurance Company, United States Fidelity and Guaranty Company, American Home
28 Assurance Company; Insurance Company of the State of Pennsylvania; Granite State Insurance Company, Safety
National Casualty Corporation, Insurance Company of the West, and United States Fire Insurance Company.